1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON TACOMA DIVISION 9 10 MG PREMIUM LTD, a limited liability company organized under the laws of the 11 Republic of Cyprus, Case No.: 3:20-cv-05134-BHS 12 Plaintiff, DECLARATION OF SPENCER 13 FREEMAN IN SUPPORT OF VS. PLAINTIFF'S EX PARTE MOTION 14 DOES 1-20, d/b/a YESPORNPLEASE.COM FOR EARLY DISCOVERY and/or VSHARE.IO, 15 NOTE ON MOTION CALENDAR: 16 Defendants. February 28, 2020 17 18 I, Spencer Freeman, under penalty of perjury, declare and state as follows: 19 1. I am an attorney at law licensed to practice before the Courts of the State of 20 Washington, the United States District Court Western District of Washington, Eastern District of 21 Washington, Ninth Circuit Court of Appeals, and United States Supreme Court. I am the 22 principle attorney with the Freeman Law Firm, Inc., attorneys for Plaintiff Paper Street Media, 23 LLC. Unless otherwise stated, I have personal knowledge of the facts contained herein this 24 declaration and, if called and sworn as a witness, could and would competently testify thereto. 25 26 DECLARATION OF SPENCER FREEMAN IN FREEMAN LAW FIRM, INC. SUPPORT OF PLAINTIFF'S EX PARTE MOTION FOR 1107 1/2 Tacoma Avenue South EARLY DISCOVERY Tacoma, WA 98042 [3:20-cv-05134-BHS] (253) 383-4500 - (253) 383-4501 (fax)

- 1

1	2. I sent emails to the following vendors associated with YesPornPlease.com:
2	Name.com, Inc., Namecheap.com, and Comodo, In.c. I inquired with each whether they would
3	honor my request for information without a subpoena. None of the vendors have responded.
4	3. In previous litigation, I have had direct contact with the following regarding
5	production of information without a subpoena: PayPal, Inc.; Domain Protection Service;
6	Cloudflare, Inc.; and Multi Media, LLC. Each of these previously entities clearly indicated that
7	they would comply with a subpoena (and have done so), but they could not produce any
8	information without a subpoena.
9	
10	I declare under the penalty of perjury under the laws of the United States of America that
11	the foregoing is true and correct.
12	
13	Execute on the 28 th day of February, 2020 at Tacoma, Washington.
14	
15	/s/ Spencer D. Freeman_
16	Spencer Freeman
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

DECLARATION OF SPENCER FREEMAN IN SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION FOR EARLY DISCOVERY [3:20-cv-05134-BHS] - 2

FREEMAN LAW FIRM, INC. 1107 ½ Tacoma Avenue South Tacoma, WA 98042 (253) 383-4500 - (253) 383-4501 (fax)